

REMARKS

Claims 1, 2, 6, 7, 9 - 12, 16 - 17, and 19 - 52 are currently pending.

I. **Objections**

1. Trademarks

The Office action has objected to the use of the terms XML, HTML and C/C++, as being trademarks requesting that “the proprietary nature of the marks should be respected and every effort [should be] made to prevent their use in any manner, which might adversely affect their validity as trademarks.” However, a review of the United States Patent and Trademark Office’s list of live registered trademarks indicates that the objected to terms (XML, HTML and C/C++) are not federally registered trademarks in any class of good related to “computer programming languages.” Page 10, lines 22 - 23. Applicant asserts that such terms are the generic terms used to identify common computer programming languages. Therefore, Applicant respectfully requests that the objection be withdrawn.

II. **Claim Rejections under 35 U.S.C. § 112**

1. Claims 1, 9, 12, 23, 25, 26, 26, 50 and 52 stand rejected under 35 U.S.C. 112 as being indefinite. Specifically, the Office action claims that “the phrase ‘associated’ renders the claim indefinite because it is unclear whether the limitation(s) following the phrase are part of the claimed invention.” Additionally, the Office action cites MPEP 2173.05(d).

MPEP 2173.05(d) relates to use of exemplary terms in claims, such as “for example,” “such as” and the like. The term associated is not an exemplary term and therefore does not fall within this category of terms.

Furthermore, Applicants assert that the term “associated” is not unclear. By definition, the term associated means 1) Connected or brought into relation, as thought, feeling, memory, etc. 2) Joined as a companion, partner or ally 3) united, combined. *Webster’s Unabridged Dictionary of the English Language*, p. 126 (copyright 2001). Thus, the term indicates that the related elements are either connected, joined and/or related in some fashion when “associated.”

Therefore, Applicants respectfully request that the rejection based on the use of the term associated be withdrawn.

III. Claim Rejections under § 102

1. Claims 1, 2, 6, 7, 9 - 12, and 16 - 52 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,295,513 issued to Thackston (The Thackston reference).

The Thackston reference describes a system in which “graphical user interfaces” can connect to a server and utilize software modules located on the server. (See Fig. 9 & Col. 17, line 52 - Col. 18, line 48). Specifically the Thackston reference states that, the “NICECAD server system 200 includes system administration and network-related software modules, as well as the various specialized software modules for CAD, EAS, multimedia communications and EC.” Col. 11, lines 46 - 49. Thus, in the system described in the Thackston reference, all processing and simulation is conducted on the NICECAD server and non-simulating “graphical user interfaces” merely access the software modules on the NICECAD server. That is, in the system described in the Thackston reference, the “graphical user interfaces” do not conduct simulation, but merely act as interfaces to software modules which are components of the NICECAD server.

Independent claim 1 and its dependent claims describe a method including the step of “accepting a connection to said simulation portal by each of said first simulation engine and said second simulation engine . . .” As noted above, the Thackston reference describes a system in which non-simulating “graphical user interfaces” connect to a NICECAD server. The “Graphical User Interfaces” in the Thackston reference simply allow users to interact with the processors on the NICECAD system and do not perform simulations. All processing and simulation in the Thackston system is conducted on the NICECAD server. That is, the “Graphical User Interfaces” are not simulation engines, but merely act as interfaces to simulation engines which are components of the NICECAD server. Thus, the Thackston reference does not anticipate, teach or suggest the step of “accepting a connection to said simulation portal by each of said first simulation engine and said second simulation engine . . .” as described in claim 1 and its dependent claims.

Independent claim 9 and its dependent claims describe a system including “means for accepting connections to said simulation portal from each of said first simulation engine and said second simulation engine . . .” As noted above, the Thackston reference describes a system in which “graphical user interfaces” connect to a NICECAD server. The “Graphical User Interfaces” of the system described in the Thackston reference simply allow users to interact with the processors on the NICECAD system. They do not perform simulations. All processing and simulation in the Thackston system is conducted on the NICECAD server. That is, the “Graphical User Interfaces” are not simulation engines. Thus, the Thackston reference does not anticipate, teach or suggest a “means for accepting connections to said simulation portal from each of said first simulation engine and said second simulation engine . . .” as described in claim 9 and its dependent claims.

Independent claim 12 and its dependent claims describe a computer program product including “instructions for accepting a connection to said simulation portal from each of said first simulation engine and said second simulation engine” As noted above, the Thackston reference describes a system in which “graphical user interfaces” connect to a NICECAD server. The “Graphical User Interfaces” of the system described in the Thackston reference simply allow users to interact with the processors on the NICECAD system. They do not perform simulations. All processing and simulation in the Thackston system is conducted on the NICECAD server. That is, the “Graphical User Interfaces” are not simulation engines. Thus, the Thackston reference does not anticipate, teach or suggest a computer program product with “instructions for accepting a connection to said simulation portal from each of said first simulation engine and said second simulation engine” as described in claim 12 and its dependent claims.

Independent claim 19 and its dependent claims describe a method for optimizing the components in a system design including the step of “receiving a simulation output file from at least one of said plurality of design teams connected to said simulation portal” As noted above, the Thackston reference describes a system in which “graphical user interfaces” connect to a NICECAD server. The “Graphical User Interfaces” of the system described in the Thackston reference simply allow users to interact with the processors on the NICECAD system. They do not perform simulations. All processing and simulation in the Thackston system is conducted on the NICECAD server. That is, the “Graphical User Interfaces” are not simulation engines. Thus, the Thackston reference does not anticipate, teach or suggest the step of “receiving a simulation output file from at least one of said plurality of design teams connected to said simulation portal” as described in claim 19 and its dependent claims.

Independent claim 23 and its dependent claims describe a simulation portal including “a communications server, allowing a plurality of simulation engines to connect to the portal and to participate in one or more of the plurality of simulations. . . .” As noted above, the Thackston reference describes a system in which “graphical user interfaces” connect to a NICECAD server. The “Graphical User Interfaces” of the system described in the Thackston reference simply allow users to interact with the processors on the NICECAD system. They do not perform simulations. All processing and simulation in the Thackston system is conducted on the NICECAD server. That is, the “Graphical User Interfaces” are not simulation engines. Thus, the Thackston reference does not anticipate, teach or suggest “a communications server, allowing a plurality of simulation engines to connect to the portal and to participate in one or more of the plurality of simulations. . . .” as described in claim 23 and its dependent claims.

Independent claim 35 and its dependent claims describe a method including the step of “granting access to the portal to a plurality of simulation engines” As noted above, the Thackston reference describes a system in which “graphical user interfaces” connect to a NICECAD server. The “Graphical User Interfaces” of the system described in the Thackston reference simply allow users to interact with the processors on the NICECAD system. They do not perform simulations. All processing and simulation in the Thackston system is conducted on the NICECAD server. That is, the “Graphical User Interfaces” are not simulation engines. Thus, the Thackston reference does not anticipate, teach or suggest the step of “granting access to the portal to a plurality of simulation engines. . . .” as described in claim 35 and its dependent claims.

Independent claim 46 and its dependent claims describe a system including “a plurality of simulation engines in communication with the portal, each of the plurality of simulation engines associated with at least one of the plurality of simulations . . .” As noted above, the Thackston reference describes a system in which “graphical user interfaces” connect to a NICECAD server. The “Graphical User Interfaces” of the system described in the Thackston reference simply allow users to interact with the processors on the NICECAD system. They do not perform simulations. All processing and simulation in the Thackston system is conducted on the NICECAD server. That is, the “Graphical User Interfaces” are not simulation engines. Thus the Thackston reference does not anticipate, teach or suggest a “a plurality of simulation engines in communication with the portal, each of the plurality of simulation engines associated with at least one of the plurality of simulations . . .” as described in claim 46 and its dependent claims.

Independent claim 52 describes a system including “a plurality of simulation engines in communication with the portal. . .” As noted above, the Thackston reference describes a system in which “graphical user interfaces” connect to a NICECAD server. The “Graphical User Interfaces” of the system described in the Thackston reference simply allow users to interact with the processors on the NICECAD system. They do not perform simulations. All processing and simulation in the Thackston system is conducted on the NICECAD server. That is, the “Graphical User Interfaces” are not simulation engines. Thus the Thackston reference does not anticipate, teach or suggest a “a plurality of simulation engines in communication with the portal. . .” as described in claim 52.

CONCLUSION

On the basis of the above-presented remarks, reconsideration and allowance of the claims is believed to be warranted and such action is respectfully requested. If the Examiner has any questions or comments, the Examiner is requested to contact the undersigned at the number below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. **50-2518**, referencing billing number **7010632001**. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. **50-2518**, referencing billing number **7010632001**.

Respectfully submitted,

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